

**Remarks**

Applicants respectfully request reconsideration of the present application in view of the above amendments and following remarks. Claims 1 and 6 have been amended. No claims have been added or cancelled. Therefore, claims 1-4 and 6 are pending in the present application.

Claims 1 and 6 have been objected to because they each recite that an element is "adapted to" perform a function. See *Office Action*, pg. 2. Therefore, claims 1 and 6 have been amended to state that the module is configured for drawing exterior air into the interior of the enclosure and to discharge air to the fuel cell assembly. Applicants request that the objection to claims 1 and 6 be withdrawn.

Claims 1-4 and 6 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,562,496 to Faville et al. ("the Faville reference"). Applicants respectfully traverse this rejection based on the above amendments.

Amended independent claim 1 is directed to an integrated self-cooling plant support module for incorporation into a fuel cell system including a fuel cell assembly. The module is disposed in an enclosure and is configured for drawing air from the exterior of the enclosure into the interior of the enclosure and to discharge air to the fuel cell assembly. The integrated module comprises an inlet port in a wall of the enclosure, a motor, a blower, an electronic control module mounted adjacent to the motor, and first and second shrouds. The motor is mounted in the enclosure adjacent to the inlet port. The blower is mechanically connected to and driven by the motor and is in communication with the air distribution system. The first shroud is positioned within the enclosure and surrounds the electronic control module. The

first shroud is open at one end to the interior of the enclosure and is connected at the other end to the second shroud. The second shroud is positioned within the enclosure and surrounds the motor. The second shroud is connected at one end to the first shroud in series and is open at the other end to the blower.

First, the Faville reference does not teach or suggest an integrated self-cooling plant support module including an electronic control module mounted adjacent to the motor as recited in amended claim 1. In the present invention, the electronic control module (40) operates to controllably operate the air control valves (58) of the runners (56) to vary the amount of heated air being fed to the fuel cell assembly from the second shroud. See *Specification*, pg. 5, lines 1-2; FIG. 2. In rejecting claim 1, the Examiner stated that the electrical actuator (162) in the Faville reference teaches the electronic control module set forth in claim 1. However, the electronic actuator (162) only operates to vary the amount of reformat passing from the main reformer (122) to the waste energy recovery unit (126), not the amount of air being fed to the fuel cell assembly from a second shroud. Therefore, Applicants submit that the Faville reference does not disclose an electronic control module as set forth in claim 1.

Second, even if it is determined that the Faville reference discloses an electronic control module, Applicants submit that the Faville reference does not teach or suggest an integrated self-cooling plant support module disposed in an enclosure, the module including a first shroud positioned within the enclosure and surrounding an electronic control module, and a second shroud positioned within the enclosure and surrounding a motor as recited in claim 1. In rejecting claim 1, the

Examiner was not specific in indicating which features included in FIG. 1 of the Faville reference he is viewing as the first and second shrouds set forth in claim 1. Therefore, since the enclosure (100) is the only structure that surrounds both the blower (110) and the electric actuator (162) within the main plenum (102), Applicants will assume for purposes of this response that the Examiner is taking the position that the enclosure (100) represents both the first and second shrouds provided in claim 1.

Given the above assumption, Applicants submit that the Faville reference does not teach all of the limitations included in claim 1. Claim 1 clearly states that the integrated self-cooling plant support module is disposed in an enclosure. Applicants agree that this enclosure may be covered by the enclosure (100) shown in FIG. 1 of the Faville reference. However, nothing in the Faville reference shows or discloses a first shroud that is separate from the enclosure (100), positioned within the enclosure (100), and surrounds the electrical actuator (162). Figure 1 of the Faville reference simply does not disclose anything in addition to the enclosure (100) surrounding the electrical actuator (162). Further, nothing in the Faville reference shows or discloses a second shroud that is separate from both the first shroud and the enclosure (100), positioned within the enclosure (100), and surrounds a motor that drives the blower (110). The Faville reference does not disclose where the motor for the blower is located, let alone a second shroud surrounding such a motor.

Lastly, the Faville reference does not teach or suggest an integrated self-cooling plant support module including a second shroud being connected at one end

to a first shroud in series and being open at the other end to a blower as recited in claim 1. As stated above, the Faville reference does not disclose a first shroud and a second shroud as defined in claim 1, let alone the second shroud being connected at one end to the first shroud in series and being open at the other end to the blower (110). For this additional reason, Applicants submit that the Faville reference fails to teach all of the limitations included in amended claim 1.

For at least the foregoing reasons, Applicants request that the rejection of claim 1 be withdrawn. As claims 2-4 depend from claim 1, these claims are also not taught or suggested by the Faville reference for at least the same reasons set forth with respect to claim 1. Applicants therefore request that the rejection of claims 2-4 be withdrawn.

As stated above with respect to claim 1, the Faville reference does not teach or suggest an integrated self-cooling plant support module disposed in an enclosure, the module including an electronic control module mounted adjacent to the motor, a first shroud positioned within the enclosure and surrounding an electronic control module, and a second shroud positioned within the enclosure and surrounding a motor. For at least the same reasons set forth with respect to claim 1, Applicants submit that the Faville reference does not teach or suggest all of the limitations included in amended independent claim 6. It is therefore requested that the rejection of claim 6 be withdrawn.

### **Conclusion**

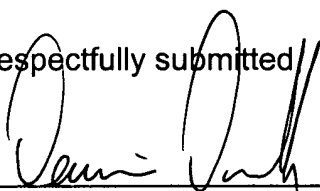
In light of the foregoing, Applicants submit that claims 1-4 and 6 are in condition for allowance and such allowance is respectfully requested. Should the

Examiner feel that any unresolved issues remain in this case, the undersigned may be contacted at the telephone number listed below to arrange for an issue resolving conference.

Applicants do not believe that any fee is due at this time. However, the Commissioner is hereby authorized to charge any fee that may have been overlooked, to Deposit Account No. 10-0223.

Dated: 9/18/06

Respectfully submitted//

  
Dennis B. Danella  
Reg. No. 46,653

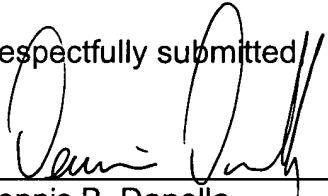
**JAECKLE FLEISCHMANN & MUGEL, LLP**  
190 Linden Oaks  
Rochester, New York 14625-2812  
Tel: (585) 899-2957  
Fax: (585) 899-2931

Examiner feel that any unresolved issues remain in this case, the undersigned may be contacted at the telephone number listed below to arrange for an issue resolving conference.

Applicants do not believe that any fee is due at this time. However, the Commissioner is hereby authorized to charge any fee that may have been overlooked, to Deposit Account No. 10-0223.

Dated: 9/18/06

Respectfully submitted//

  
Dennis B. Danella  
Reg. No. 46,653

**JAECKLE FLEISCHMANN & MUGEL, LLP**  
190 Linden Oaks  
Rochester, New York 14625-2812  
Tel: (585) 899-2957  
Fax: (585) 899-2931